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TOXICOLOGY DEPARTMENT

P.O. BOX 12014, 2 T.W. ALEXANDER DRIVE  
RESEARCH TRIANGLE PARK, NC 27709  
(919) 549-2000 TELEFAX (919) 549-6525  
INTERNATIONAL TELEX NUMBER 4999378-ANSWERBACK APC RTP

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October 5, 1992

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RETURN RECEIPT REQUESTED

Document Processing Center (TS-790)  
Office of Toxic Substances  
US Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

8EHQ-92-12596

88920010780

INIT

Attn: Section 8(e) Coordinator (CAP Agreement)

RE: Report Submitted Pursuant to the TSCA Section 8(e) Compliance Audit Program

CAP ID No.: 8ECAP - 0004

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN 5266, Princeton, NJ 08543-5266) and its subsidiary Rhône-Poulenc Ag Company, the attached study report is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program and the Agreement for a TSCA Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA.

The enclosed study report provides information on MC 2600. The CAS number and name for this chemical are 22787-58-2 and phosphorothioic acid, O,O-diethyl ester, O-ester with 1-ethyl-4-hydroxy-6-methyl-2(1H)-pyridone. This chemical was synthesized for pesticide research and development approximately 15 to 20 years ago. To our knowledge, a pesticide application on this chemical has never been submitted to EPA under the Federal Insecticide, Fungicide, and Rodenticide Act.

No claims of confidentiality are made for this submission. The title of the enclosed report is "Acute Oral Toxicity Study in Rats with Mobil Chemical Company's Compound Identified as: MC 2600". The following is a summary of the adverse effects observed in this study.

This study is being submitted under Section 8(e) because of observed clinical signs and the oral LD50 was 7.07 mg/kg with 95% confidence limits of 4.37 to 11.4 mg/kg. Clinical signs included convulsions, tremors, increased respiration, and salivation. The tremors and convulsions were observed only immediately prior to death.

No previous TSCA Section 8(e) notices have been submitted on this chemical. In total, RPI is submitting three copies of the enclosed report and this cover letter: an original and two copies.

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3/3/95

6

Further questions regarding this submission may be directed to the undersigned at 919-549-2222.

Sincerely,



Glenn S. Simon, PhD, DABT  
Director of Toxicology

**AME Associates**  
BIOLOGICAL RESEARCH

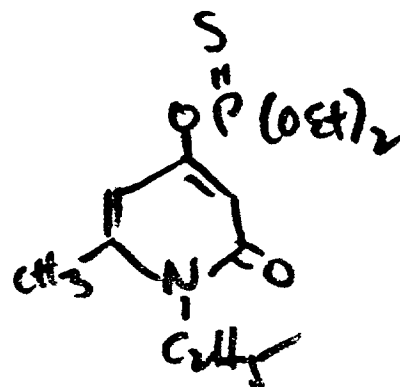
PRINCETON PIKE, P. O. BOX 57

PRINCETON, N. J. 08540

TEL.: (609) 924-9658

Project #20-225

Acute Oral Toxicity Study in Rats  
with  
Mobil Chemical Company's Compound  
Identified as:  
MC-2600



Conducted for  
Mobil Chemical Company  
Edison, New Jersey

Submitted by

AME ASSOCIATES  
Princeton, New Jersey

A. M. E. ASSOCIATES P.O. BOX 57 PRINCETON, N. J. 08540

November 24, 1967

PROJECT #20-225

SPONSOR: MOBIL CHEMICAL COMPANY

SUBJECT: Acute Oral Toxicity Study in Rats with  
Mobil Chemical Company's Compound  
Identified as: MC-2600

OBJECTIVE

To study the acute oral toxicity in rats of Mobil Chemical Company's compound identified as MC-2600 when administered by means of a stomach catheter.

MATERIAL

Compound MC-2600 supplied by Mobil Chemical Company for use in this study.

PROCEDURE

An approximation of the LD<sub>50</sub> was attained by administering the chemical compound to a number of rats on each of several levels. Following this, a group of twenty young adult, male albino rats of the Sprague-Dawley Strain weighing approximately 200-250 grams was selected for use in this study. The animals were divided into four subgroups of five animals each and fasted for twenty-four hours prior to dosing.

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The experimental material was placed in a syringe and introduced through the esophagus into the stomach with a stainless steel catheter.

Five rats were dosed at 2.50 mg/kg with a 0.1% v/v solution in water (i.e., .01 ml in 10 ml or 0.1 ml in 100 ml). Five rats were dosed at 5.0 mg/kg with a 0.1% v/v solution in water. Five rats were also dosed at 10.0 mg/kg and five at 20.0 mg/kg, both with a 1.0% v/v solution in water (i.e., 0.1 ml in 10 ml or 1.0 ml in 100 ml).

Animals on the same dosage level were then placed in a common cage with free access to food and water. The cages employed had wire mesh floors elevated above the droppings and were kept in temperature controlled rooms at  $72^{\circ}\text{F} \pm 2^{\circ}\text{F}$ . Light was furnished for eight out of every twenty-four hour period.

The animals were observed for a fourteen day period and deaths were recorded.

The  $\text{LD}_{50}$  was calculated using the Thompson Moving Average Method (Biometrics, September, 1952, Vol. 8, No. 3).

-3-

Dosage mg/kg	No. of Animals	<u>RESULTS</u>														Total S* D**	
		<u>Number and Days of Death</u>															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14		
2.5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0
5.0	5	1	0	1	0	0	0	0	0	0	0	0	0	0	0	3	2
10.0	5	3	0	0	0	0	0	0	0	0	0	0	0	0	0	2	3
20.0	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5

\*Survivors

\*\*Deaths

### OBSERVATIONS

Death, preceded immediately by convulsions lasting about 2 minutes, occurred within 10 minutes of dosing on the 20 mg/kg level; two of the rats dosed at this level exhibited exophthalmia and injection of the eyes.

Mortalities on the 10 mg/kg level occurred within 35 minutes for two of the rats that died, and within 2 hours and 15 minutes for the other one. (All evidenced watery eyes, quick tremors immediately preceding death, and an increase in respiration immediately following dosing.

All rats dosed at the 5 mg/kg level exhibited notable increase in respiratory rate within 50 minutes of dosing; the two deaths were both immediately preceded by tremors; all five revealed increased salivation after dosing.

The rats on the 2.5 mg/kg level evidenced no clinical signs except slight increase in respiratory rate immediately following dosing.

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CONCLUSIONS

The oral LD<sub>50</sub> of Mobil Chemical Company's Compound MC-2600 is 7.07 mg/kg with 95% confidence limits of 4.37 mg/kg to 11.43 mg/kg.

SUBMITTED BY

Harry C. Fegley  
AME ASSOCIATES  
Harry C. Fegley, V.M.D.  
Director



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

Glenn S. Simon, Ph.D., DABT  
Director of Toxicology  
Rhône-Poulenc  
P.O. Box 12014  
2 T.W. Alexander Drive  
Research Triangle Park, North Carolina 27709

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

APR 24 1995

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)  
Attn: TSCA Section 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

*Terry R. O'Bryan*  
Terry R. O'Bryan  
Risk Analysis Branch

Enclosure

12596A



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contains at least 50% recycled fiber



### Triage of 8(e) Submissions

Date sent to triage: 12/14/95

NON-CAP

CAP

Submission number: 12596A

TSCA Inventory:

Y

N

0

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

RTOX

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.):

Notes:

**THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY**

#### For Contractor Use Only

entire document: 0 1 2 pages 1, 2

pages 1, 2, MB

Notes:

Contractor reviewer :

PJR

Date:

5/18/95

CCECATS/TRIAGE TRACKING DBASE ENTRY FORM

CCECATS DATA: Submission # BEHQ- 1092-12596 SEQ: A

TYPE: INT SUPP FLWP

SUBMITTER NAME: Pharm - Poulenc Inc.

INFORMATION REQUESTED: FLWP DATE: 03/03/95  
 0501 NO INFO REQUESTED  
 0502 INFO REQUESTED (TECH)  
 0503 INFO REQUESTED (VOL ACTIONS)  
 0504 INFO REQUESTED (REPORTING RATIONALE)

DISPOSITION:  
 0505 REFER TO CHEMICAL SCREENING  
 0506 CAP NOTICE

SUB. DATE: 10/05/90 OTS DATE: 10/13/92 CSRAD DATE: 03/03/95

CHEMICAL NAME:

Phosphorothioic acid, O,O-dithyl ester, O-  
ester with 1-ethyl-4-hydroxy-6-methyl-  
2(1H)-pyridone

CASE: 22787-58-2 → MC - 2600

VOLUNTARY ACTIONS:  
 0401 0402 ACTION REQUESTED  
 0403 STUDIES PLANNED (ANIMAL)  
 0404 MUTAGENICITY (IN VITRO)  
 0405 LAMPLASIDS (TUMORS)  
 0406 PROCESSION (TUMORS)  
 0407 APP USE DISCONTINUED  
 0408 PRODUCTION DISCONTINUED

INFORMATION TYPE	P.F.C.	INFORMATION TYPE	P.F.C.
0201 ONCO (HUMAN)	01 02 04	0216 EPICLIN	01 02 04
0202 ONCO (ANIMAL)	01 02 04	0217 HUMAN EXPOS (PROD CONTAM)	01 02 04
0203 CELL TRANS (IN VITRO)	01 02 04	0218 HUMAN EXPOS (ACCIDENTAL)	01 02 04
0204 MUTA (IN VITRO)	01 02 04	0219 HUMAN EXPOS (MONITORING)	01 02 04
0205 MUTA (IN VIVO)	01 02 04	0220 ECOAQUA TOX	01 02 04
0206 REPRO/TERATO (HUMAN)	01 02 04	0221 ENV. OCCURRENCE	01 02 04
0207 REPRO/TERATO (ANIMAL)	01 02 04	0222 EMER ENCI OF ENV CONTAM	01 02 04
0208 NEURO (HUMAN)	01 02 04	0223 RESPONSE REQUEST DELAY	01 02 04
0209 NEURO (ANIMAL)	01 02 04	0224 PRODCOMP/CHIEF ID	01 02 04
0210 ACUTE TOX. (HUMAN)	01 02 04	0225 REPORTING RATIONALE	01 02 04
0211 CHR. TOX. (HUMAN)	01 02 04	0226 CONFIDENTIAL	01 02 04
0212 ACUTE TOX. (ANIMAL)	01 02 04	0227 ALLERG (HUMAN)	01 02 04
0213 SUB ACUTE TOX (ANIMAL)	01 02 04	0228 ALLERG (ANIMAL)	01 02 04
0214 SUB CHRONIC TOX (ANIMAL)	01 02 04	0229 METAPHARMACO (ANIMAL)	01 02 04
0215 CHRONIC TOX (ANIMAL)	01 02 04	0230 METAPHARMACO (HUMAN)	01 02 04
		0231 PRODUCE/PROC	01 02 04
		0232 MEDS	01 02 04
		0233 OTHER	01 02 04
		0234	01 02 04
		0235	01 02 04
		0236	01 02 04
		0237	01 02 04
		0238	01 02 04
		0239	01 02 04
		0240	01 02 04

IMAGE DATE: NON-CHL INVENTORY  
 YES (DROP/REFER) NO (CONTINUE) DEFER

TOXICOLOGICAL CONCERN: LOW MED HIGH

USE: Pesticide R: D

PRODUCTION:

CAS SR: NO IN INVENTORY

Acute Oral Toxicity

10/19/95

12596A

Acute Oral Toxicity - High

Acute oral toxicity is high based on a calculated LD<sub>50</sub> of 7.07 mg/kg in rats. Mortality and corresponding doses (mg/kg) were 0/5 (2.5), 2/5 (5), 3/5 (10), and 5/5 (20). Convulsions (20), tremors (5, 10) and increased respiration (2.5, 5, 10) were observed.